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June 5, 2017

VIA ECF

The Honorable Denise Page Hood United States District Judge United States District Court Eastern District of Michigan Theodore Levin U.S. Courthouse 231 W. Lafayette Blvd., Room 251 Detroit, MI 48226

> Re: The Shane Grp., Inc. v. Blue Cross Blue Shield of Mich., No. 2:10-cv-14360-DPH-MKM

Dear Judge Hood:

I write on behalf of the Plaintiffs in the above-captioned action to address some of the deadlines in our proposed order to preliminarily approve the Amended Settlement Agreement. Plaintiffs have learned that the publication schedule of one of the publications in the Notice Plan (Exhibit A to the Amended Settlement Agreement and as amended on November 21, 2016, Dkt. #308) has changed. This change requires a slightly longer period – 17 more days – for completing publication notice. This, in turn, requires that the deadlines for objections, opt outs and the motion for final approval of the settlement, be extended by the same number of days.

In reviewing the proposed preliminary approval order, we noticed that there is a blank in paragraph 12 for the deadline for additional claim forms (beyond those previously submitted in connection with the original settlement) to be submitted. Since this deadline was not addressed at the preliminary approval hearing, Plaintiffs now propose a claims deadline of December 29, 2017.

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For the Court's convenience, a revised proposed preliminary approval order that reflects these changes is being submitted with this letter (Ex. 1), as well as a redlined copy (Ex. 2). Defendant Blue Cross Blue Shield of Michigan has reviewed this proposed order and does not object to the revisions. Pursuant to R11, of the Electronic Filing Policies and Procedures, Plaintiffs will also submit a Word version of the proposed order.

We are happy to address any questions the Court has about these revisions.

Respectfully submitted,

GUSTAFSON GLUEK PLLC

Dand C. Hedd

Daniel C. Hedlund

DCH/jlh

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CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2017, I electronically filed the foregoing document and proposed order, with the Clerk of the Court using the ECF system which will send notification of such filing to all filing users indicated on the Electronic Notice List through the Court's electronic filing system.

I also certify that I will serve copies via First Class U.S. Mail and e-mail, upon all other parties indicated on the Manual Notice List.

/s/ Daniel C. Hedlund

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